Polymers and Resins IV Inspection Guide

General Information:

Company Name: _____

Address: _____ **AFS#**_____

City: _____ **County:** _____ **State:** _____

Phone Number: _____

Date(s) of Inspection: _____

Arrival Time(s): _____ **Departure Time(s):**_____

On-Site Representatives			
Company Personnel/ Title:		**Company Contractors:**	

Inspectors			
State/Local Personnel:		**EPA Personnel (including contractors):**	

[Obtain business cards if possible]

Specific Information:

Type(s) of Thermoplastic(s) Produced: _____

What is the Method of Production?
(Circle all that apply) **BATCH** **CONTINUOUS**

Number of Employees: _____ (Break down by process)

Small Business Information Sheet Provided by EPA? YES NO

Daily Operation: Days/Week:_____ Hours/Day:_____

Does production change based on customer demand?

Are there Scheduled Shutdowns? YES NO

Duration: _____ Frequency: _____

Description of Process(es) (Narrative and/or Process Flow Diagram):
(Mark Flow Diagram to show JJJ Subject Components)

Interview Questions

Storage Vessels

What storage vessels are associated with (e.g. feeds or receives chemicals from) the Group IV process lines?

Are these shared with any other processes?

When were they installed?

What are their capacities?

What chemicals are being stored?

How is this material being received?

How often do you receive shipments?

Are any of the tanks classified as Group 1 or Group 2?

Who did these determinations?

What types of records are you keeping? (Review these records during the records review)

(For Group 1)

> For the Group 1 storage tanks, what type are they? (e.g. fixed roof, internal floating, external floating etc.)?

When did you perform your last tank inspections *(leak and seal gap measurements)*?

When is the next inspection planned?

What did you examine during your last inspection? (e.g seals, gaps, defects, etc.)

(*For Group 1 tanks that vent to a control device)*

What type of control device do you use?

What is the control efficiency?

How was the efficiency established? (e,g. manufacturers guarantee, stack tests, engineering estimates?)

If stack test: When was the last stack test done?
(Review test during records review)

How do you know the control device is working properly?

What parameter(s) do you monitor?

Frequency?

How did you establish those parameter(s)?

What documentation do you keep?
(that establishes the parameter, that records the parameter...)

Interview Questions

Batch Process Vents

Do you have Batch Process Vents? (Expect if batch process)

Where are the located in the process?

Are they Group 1 or Group 2?

Who did the determination?

How was the determination done?

What documentation is being kept? (Review during records review)

(*For Group 1)*

What type of control device do you use?

What is the control efficiency?

How was the efficiency established? (e,g. manufacturers guarantee, stack tests, engineering estimates?)

If stack test: When was the last stack test done? (Review test during records review)

How do you know the control device is working properly?

What parameter(s) do you monitor?

Frequency?

How did you establish those parameter(s)?

What documentation do you keep?
(that establishes the parameter, that records the parameter…)

(*For Group 2)*

How do you ensure it does not become a Group 1 stream?

Do you have to do any monitoring? What type and how often?

What records are you keeping?

Interview Questions

Continuous Process Vents

Do you have Continuous Process Vents? (Expect if continuous process)

Where are the located in the process?

Are they Group 1 or Group 2?

Who did the determination?

How was the determination done?

What were the calculated TRE index values?

What documentation is being kept? (Review during records review)

(*For Group 1)*

What type of control device do you use?

What is the control efficiency?

How was the efficiency established? (e,g. manufacturers guarantee, stack tests, engineering estimates?)

If stack test: When was the last stack test done? (Review test during records review)

How do you know the control device is working properly?

What parameter(s) do you monitor?

Frequency?

How did you establish those parameter(s)?

What documentation do you keep?
(that establishes the parameter, that records the parameter...)

(*For Group 2)*

How do you ensure it does not become a Group 1 stream?

Do you have to do any monitoring? What type and how often?

What records are you keeping?

Interview Questions

Wastewater

Where are wastewater streams generated in your process?

Are they process or maintenance wastewater?

Are there any written descriptions of maintenance procedures as related to maintenance wastewater?

Are any of the process streams classified as Group 1 or Group 2?

How was this determination done?

Where in the process is the wastewater generated?

Is wastewater treated onsite? Or transferred off site?

What path does it take its been generated? (e.g. through wastewater tanks, surface impoundments, containers, individual drain systems, oil-water separators?)

(For Group 1 streams)

> For each of these units, *(wastewater tanks, surface impoundments, containers, individual drain systems, oil-water separators)* what controls (*i.e. water seals, covers, internal roof tanks, control devices)* are associated with these units?
>
> For each of these units, when were the last leak inspections done, how often are they done, how were they done, and what records are kept? (Review during

records review)

For Group 1 Wastewater tanks, when was the last tank inspection done, what was recorded, etc?

How is the wastewater being treated?

(For all units that vent to a control device)

What type of control device?

What is its efficiency?

How was the efficiency determined?

How do you know is operating properly?

What parameter(s) do you monitor?

Frequency?

How did you establish those parameter(s)?

What documentation do you keep? (Review during records review)
(that establishes the parameter, that records the parameter...)

LDAR

How were MACT determinations made? By whom?

Where tests conducted? YES NO If "yes," which methods were used?

Are any process lines concentration variable? YES NO If "yes," which ones?

Do you conduct your LDAR program in house or do you have a contract with an outside company?

If contracted out, to whom? How long has the contractor been on-site? Who is the plant engineer? Where are calibrations conducted? How are calibrations performed? How often? What gas concentrations are used? What are the expiration date(s)?

How often do you monitor each type of component?

Pumps:	MONTHLY	QUARTERLY	SEMI-ANNUALLY
	ANNUALLY		
Valves:	MONTHLY	QUARTERLY	SEMI-ANNUALLY
	ANNUALLY		
Compressors:	MONTHLY	QUARTERLY	SEMI-ANNUALLY
	ANNUALLY		
Agitators:	MONTHLY	QUARTERLY	SEMI-ANNUALLY
	ANNUALLY		
Connectors:	MONTHLY	QUARTERLY	SEMI-ANNUALLY
	ANNUALLY		

Description of other monitoring frequencies:

What leak level are you monitoring for?

Equipment	Concentration (ppm)
Pumps	
Valves	
Compressors	
Agitators	
Connectors	

Have you chosen to implement any alternative programs? (e.g., 2% leak for valves, batch processes, QIP)

Do you have any unsafe to monitor, or difficult to monitor components? If yes, how do you conduct monitoring?

Define unsafe and/or difficult to monitor:

After a leak has been identified, what procedure is in place to insure that it is repaired? (Track reported leak from Periodic Report back through all paperwork to instrument reading. Include calibration information and attach any copies of paperwork.)

How are leaks reported? (after-hour, week-ends, etc.)

Do you do any sampling during any portions of your process? If so, how do you conduct your sampling?

Where are your open-ended valves and lines located? How many do you have? What method have you chosen to use to control emissions from these lines? (e.g., cap, blind flange, plug, second valve) *[During the tour look for open ended valves and lines, and insure that the line is properly sealed off.]*

(If possible) Observations noted while watching an operator monitor equipment:

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